

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CYRUS HARRIS, et al.,)	
)	
Plaintiffs,)	No. 08 C 541
)	
vs.)	Judge Coar
)	Magistrate Judge Nolan
ILLINOIS STATE POLICE, et al.,)	
)	
Defendants.)	

INITIAL STATUS REPORT

Pursuant to this court's order, Lawrence V. Jackowiak, representing Plaintiff, and Shirley Calloway representing the individual Defendants, spoke on April 11, 2008 pursuant to Rule 26(f) to discuss:

- (1) the nature and basis of their claims and defenses:
- (2) the possibilities for a prompt settlement or resolution of this case:
- (3) to make or arrange for the disclosures required under Rule 26(a)(1); and
- (4) to develop a discovery plan.

To the end the parties propose the following:

A. The issues in this case may be simplified by taking the following steps:

1. None

B. The following modifications to the discovery requirements of the Federal Rules of Civil Procedure or Local Rules should be made in order to expedite discovery:

None.

C. Discovery will be needed on the following subjects:

Plaintiff's have served Defendants with Fed.R.Civ.P. 26(a)(1) disclosures on March 14, 2008.

Defendants will serve their Fed.R.Civ.P. 26(a)(1) disclosures on or before April 30, 2008.

The parties jointly propose to the court the following discovery plan:

It is anticipated that discovery will be needed on the following subjects:

(a) the unreasonable seizure; (b) the excessive force; (c) illegal search of person; (d) illegal search of home; (e) illegal search of vehicle; (f) illegal seizure of property; (g) *Monell* claim; and (h) indemnification claim.

The Plaintiffs' damages, including loss of physical liberty, emotional distress, pain and suffering, and other damages including missing property.

All discovery commenced in time to be completed by December 12, 2008.

Supplementation under Rule 26(e) due upon receipt of new information.

D. Discovery should be conducted with fact discovery prior to expert discovery.

E. Discovery is likely to be contentious and management of discovery should be referred to the Magistrate Judge.

F. The parties do not consent at this time to this matter being referred to the Magistrate Judge for final disposition.

G. The parties have discussed the possibility of alternative dispute resolution and believe that a settlement conference may be appropriate after some written discovery.

H. Settlement is likely, but can be better evaluated after written discovery has been completed.

I. The Court should consider the following methods of expediting the resolution of this matter:

Final list of witnesses and exhibits under Rule 26(a)(3) should be due:

- From Plaintiff by at least 30 days before trial or in the Final Pretrial Order.
- From Defendants by at least 30 days before trial or in the Final Pretrial Order.

Parties should have 14 days after service of final list of witnesses and exhibits to list objections under Rule 26(a)(3).

The case should be ready for trial 14 days after the final pretrial conference and at this time is expected to take approximately three (3) days.

Respectfully submitted,

Dated: April 11, 2008

/s/ Lawrence V. Jackowiak
Law Offices of Lawrence V. Jackowiak
20 North Clark Street, Suite 1700
Chicago, Illinois 60602
(312) 795-9595
Counsel for the Plaintiff

Dated: April 11, 2008

/s/ Shirley Calloway
Assistant Corporation Counsel
30 North LaSalle Street, Suite 1400
Chicago, Illinois 60602
(312) 814-5581
Attorney for the Defendants